

# EXHIBIT D-1

**ACHIEVEMENTS OBTAINED BY JUDGMENT IN THE  
CASE KAC-1990-0487 - JUAN PÉREZ COLÓN CASE**

[Stamp:] RECEIVED / MAY 25 2021 / PRIME CLERK LLC

- 1) Voiding the directive issued by OCAP in Special Memorandum 5-86 to implement the minimum wage adjustment.
- 2) Permanent injection concept where the D.T.O.P. is ordered to keep the salary structure updated in accordance with the increases in the minimum wage.
- 3) The payment of all salaries and wages foregone due to the inoperability of the scales:

The period from April 1986 to 1995 is calculated according to OCAP model scales applied to the different increases.

With respect to the scale that became effective as of January 2000, it will be effective as of September 1, 1997.

The same procedure must be followed with respect to the increase that becomes effective in September 2000.

Reinstate salary increases that were eliminated when the minimum wage was implemented by adding them after assigning the positions to the scales.

- 4) Pay accrued legal interest from the date of filing of the date of the lawsuit.
- 5) The attorneys are granted a term to report individual debts.
- 6) Awarded costs and attorney's fees.

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COMMONWEALTH OF PUERTO RICO  
TRIAL COURT  
SUPERIOR COURT OF SAN JUAN

[partially illegible stamp: May 7, 2007, 10:00/ Clerk's Office]

JUAN PEREZ COLON, ET AL.

CIVIL NO. KAC-90-487 (905)

Plaintiffs

IN RE:

CLAIM FOR WAGES AND DECLARATORY  
JUDGMENT

VS.

COMMONWEALTH OF PUERTO RICO, ET AL.

Defendants

JOINT MOTION REQUESTING THE ISSUANCE OF A PARTIAL RESOLUTION IN PAYMENT OF  
JUDGMENT AND NOTIFICATION OF STIPULATED CALCULATIONS UNTIL SEPTEMBER 2000  
AND ON ADDITIONAL PROCEDURES.

TO THE HONORABLE COURT.

The plaintiffs, represented by their respective undersigned counsel, appear and respectfully submit and request before this Honorable Court:

At the follow-up hearing held on February 1, 2007, this Honorable Court was informed that after a thorough verification and comparison process, the appellant accepts as correct the calculations reported on the wages owed to the appellants. However, since the DTOP submitted the calculations report up to September 2000, it was clarified that the same would be accepted, to the effect that a Partial Resolution be issued and a term of 120 days be granted to the Department of Public Works (DTOP) to complete and update said calculations up to the present, and this honorable Court issued the corresponding Order. In addition, it ordered the agency to proceed to correct the change reports of the individual employees so that the corresponding salary adjustments would be made.

The names, social security and individual amounts due through September 2000 are identified below. In addition, the names of some claimants whose calculations remain unaccounted for because the files have not been located are listed.

	NAME	SOCIAL SECURITY	AMOUNT OWED up to September 2000 [1st PAYMENT]
1.	ABRIL VELEZ, BENNY	2192	\$ 16, 023.
2.	ACEVEDO HERNANDEZ, ANGEL L.	8332	\$ 4, 340
3.	ADORNO AGOSTO, ANDRÉS	2428	\$ 4, 108.
4.	ADORNO AGOSTO, PABLO	8553	\$ 11, 538.50
5.	ADORNO MERCED, WILFREDO	8949	\$ 10, 111.
6.	ADORNO OJEDA, AGUSTÍN	3512	\$ 13, 611.50
7.	AGOSTO AGOSTO, PEDRO	2378	\$ 10, 777.
8.	AGOSTO MENDEZ, WANDA	8798	\$ 21, 484.50
9.	AGOSTO ORTIZ, RAFAEL	0359	\$ 11, 471.
10.	AGOSTO ROSADO, BIENVENIDO	8805	\$ 13, 906.50

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COMMONWEALTH OF PUERTO RICO  
TRIAL COURT  
SUPERIOR COURT OF SAN JUAN  
GENERAL COURT OF JUSTICE

*[handwritten:]*

Wednesday, May 19, 2021

*Claim: 7490, dated April 16, 2018*

*TO: Commonwealth of Puerto Rico*

*FROM: Félix Rivera Clemente, Tel. 787-525-9643*

*Employee: of the Department of Transportation and Public Works, Traffic Regulation Division, of the Government of Puerto Rico*

*Classification: Sign Workshop Supervisor since August 16, 2004, not a seller of services to the Government of Puerto Rico*

*Subject: Money that is owed me from this entity, the Government of Puerto Rico due to the non-compliance of the former Governor of Puerto Rico Alejandro Garcia Padilla.*

*Obtained by lawsuit filed by Ivonne Gonzalez Esq. in the Trial Court in Hato Rey, San Juan, Puerto Rico. Claim Juan Perez Colon # KAC – 90 – 487 (905) because of failure to make changes in the wages of Public employees, which was won in 2006. \$30,000 for each employee. They paid me \$12,698.08, they owe me*

*excuse the error of \$18,000*

*The correct amount is \$17,301.92 plus interest from the total amount of money obtained through the lawsuit and all the money that accumulated once again (the change of salary that did not materialize) that they have paid up to December of 2011.*

*The change of salary has to be updated up to the present time (May of 2021). The 25% for legal representation is covered by the Government of P.R.*

*\$30,000.00*

*-\$12,698.08*

*\$17,301.92 → Excuse the error. This is the correct amount, not \$18,000.00*

*As a Sign Workshop Supervisor in the Government of Puerto Rico, not that of a seller of services to the Government of Puerto Rico*

*Sincerely,*

*Felix Rivera Clemente*

*[signature]*

*Felix Rivera Cleante  
HC 2 P.O. Box 9045  
Loiza, P.R. 00772-9662*

SAN JUAN PR 009  
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MAY 25 2021  
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### TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)  
TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 7490 (2)**

Signed this 11<sup>th</sup> day of August, 2021



Verify at [www.atanet.org/verify](http://www.atanet.org/verify)

A handwritten signature in blue ink, appearing to read 'Andreea I. Boscor'.

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Andreea I. Boscor

